

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
CUMMINGS MANOOKIAN, PLLC,)	Case No. 3:19-bk-07235
Debtor.)	Chapter 7
)	Judge Walker
JEANNE ANN BURTON, TRUSTEE,)	
Plaintiff,)	
)	
v.)	Adv. Proc. No. 3:20-ap-90002
)	
HAGH LAW, PLLC; AFSOON HAGH;)	
MANOOKIAN, PLLC; and FIRST-)	
CITIZENS BANK & TRUST)	
COMPANY,)	
Defendants.)	
)	

STATUS REPORT

Jeanne Ann Burton, chapter 7 trustee herein (the “Trustee”), hereby provides this status report in advance the status conference to be conducted by this Court on April 23, 2025.

On March 5, 2025, this Court conducted a status hearing and pretrial conference in this matter. As a result of that pretrial conference, the Court entered an order establishing April 21, 2025, as the deadline for completing discovery. On March 25, 2025, the Trustee sent letters to Craig Gabbert, counsel for Afsoon Hagh and Hagh Law, PLLC, and John Spragens, counsel for Manookian, PLLC, requesting responses to certain discovery requests that the Trustee considers incomplete. The Trustee requested those responses by April 11, 2025. Subsequently, on April 3, 2025, Mr. Gabbert’s law partner, Glenn Rose, emailed Trustee’s counsel and informed him that Mr. Gabbert was out of the country and would unlikely be able to respond by April 11, 2025. Mr. Spragens did not respond to the discovery request.

Additionally, the Trustee is attempting to depose two third-parties, Marty Fitzgerald and Melissa Fitzgerald. Melissa Fitzgerald was served with a subpoena for documents and for testimony, and a deposition is currently scheduled for April 17, 2025. Service of the subpoena upon Marty Fitzgerald has been unsuccessful to date.¹

The Trustee anticipates requesting that the Court extend the deadline for completing discovery by approximately (60) days to permit her to complete these two depositions and to resolve the disputes concerning the outstanding discovery responses due from the Defendants.² The Trustee also anticipates discussing, at the April 23, 2025, pretrial conference, whether motions to compel the Defendants to respond to the outstanding discovery requests will be necessary.³

Dated: April 16, 2025

Respectfully submitted,

/s/ Phillip G. Young, Jr.
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Special Counsel for Trustee

¹ The Court may recall that it has previously ordered Mr. Fitzgerald to produce documents and to appear for a deposition. Due to the extended delay caused by the motions to recuse, neither the document production nor the deposition has occurred.

² Given the pending appeal in the related adversary proceeding, Adv. Pro. No. 23-90036, this should cause no unwarranted delay.

³ The Court has already entered multiple orders concerning discovery disputes in this case, to no avail. The Trustee is reluctant to continue filing motions to compel absent some direction from the Court.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via the Court's electronic filing system upon all parties having entered appearances therein on this the 16th day of April, 2025.

/s/ Phillip G. Young, Jr. _____
Phillip G. Young, Jr.